

# **EXHIBIT II**

**REDACTED VERSION OF DOCUMENT SOUGHT  
TO BE SEALED**

**EXHIBIT 1**  
**[REDACTED VERSION OF DOCUMENT**  
**SOUGHT TO BE SEALED]**

## REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

<u>Row in Plaintiffs' Ex. 72 or Exhibit</u>	<u>Document Cited by Plaintiffs</u>	<u>Plaintiffs' Description</u>	<u>Seagate's Response</u>
1	FED_SEAG0076611	Internal Seagate Spreadsheet tracking customer complaints for 30 days on Twitter	This document cannot relate to the Drives because it covers 2011-02-01 to 2011-03-01 — which is <i>before the ST3000DM001 was manufactured</i> . See ECF No. 150-6 (Almgren Decl.), ¶ 11 (ST3000DM001 first approved for manufacture on April 28, 2011).
2	FED_SEAG0093297	Seagate document recording customer reviews on Amazon from 1/1/2011 to 4/7/2011	This document cannot relate to the Drives because it is dated 2011-04-06 — which is <i>before the ST3000DM001 was manufactured</i> . See ECF No. 150-6 (Almgren Decl.), ¶ 11 (ST3000DM001 first approved for manufacture on April 28, 2011).
3	FED_SEAG0076936	Internal Seagate document tracking 954 negative customer reviews for drives on Amazon, Bazaarvicioe , and Best Buy between 2011 and 2012.	This document references numerous products and sizes of drives not at issue in this litigation. Plaintiffs quote three “example reviews.” <i>None of them relates to the Drives at issue</i> . The first two are Amazon reviews attached hereto as <b>Exhibit A</b> . They are for 2TB products. Plaintiffs cut off the remainder of the third review in which the reviewer specifies that the review is for a 1TB drive – the “barracuda 720012 <u>1TB</u> sn. 6VPAGXJA” – not the 3TB ST3000DM001 Drive at issue in this litigation. In addition, the comment is dated 8/21/2011, and the ST3000DM001 was not approved for manufacture as a “Barracuda” Internal drive product until October 18, 2011. See, e.g., ECF No. 133-5, fn. 3; ECF No. 152-3, ¶ 4 (“Barracuda” was an Internal product); ECF No. 150-6, ¶ 18 (ST3000DM001 not approved for manufacture as an Internal drive until October 2011). Accordingly, the third review also does not relate to the ST3000DM001. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
4	FED_SEAG0093523	Spreadsheet detailing 46,960 customer email complaints to Seagate	The table relates to at least 54 different products, <i>more than half of which (at least 29) are not at issue</i> . In addition, while the table contains over 46,000 rows, many rows relate to the same customer and drive (same serial number). For example, 11 rows relate to a drive with serial number S1F07CPR; 8 rows

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			relate to a drive with serial number S1F07MVQ, <i>etc.</i> Furthermore, a large number of the contacts are <b><i>not complaints</i></b> . For example, one exchange involves a customer inquiring “I am looking for a second power cable since the first was lost;” another asks “Is it possible to purchase the Seagate GoFlex Home Network base and use it with the hard disk drive?;” another asks “Does the Windows version of this software includes a means by which to override the sleep settings?;” another reports “Thank you, the problem is finally solved. Your support has been most appreciated.” None of these interactions relate to drive failures. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
5	FED_SEAG0076706	Internal Seagate document tracking Expansion reviews Amazon, noting that Drive Failures are most common complaint	This document contains reviews for multiple sizes of drives not at issue in this litigation, including 750 GB, 500 GB and 1TB products. Plaintiffs claim that drive failures are the most common complaint, and reproduce a bar graph showing that 10 reviews were categorized as “failures.” However, without determining which, if any, of the 10 “failures” in the chart relate to the ST3000DM001, it is impossible to know whether failures are the most common complaint for the Drives. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
6	FED_SEAG0076615	Internal Seagate document tracking Expansion reviews Amazon, noting that Drive Failures are most common complaint	<b>This is the same document as FED_SEAG0076706, discussed in the row above.</b> Plaintiffs quote two reviews. <b>Exhibit B</b> hereto is a true and correct copy of the second review Plaintiffs quote. The review is for a 1TB “portable” drive, at issue in this action. The other review is for the Seagate Expansion Desk 3TB product, for which Amazon shows <b><i>62% 5-star reviews and only 13% 1-star reviews</i></b> . See <b>Exhibit C</b> hereto. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
7	FED_SEAG0076609	Internal Seagate document tracking	This document covers numerous products and sizes of drives not at issue (including wireless products, portable products and other product types, sizes

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		1,738 Amazon reviews and Seagate's public responses	and categories). Plaintiffs cite three reviews that appear to relate to products at issue. The document contains links to the reviews on Amazon's website. Two reviews relate to the Seagate Expansion Desk 3TB product, <i>for which Amazon shows 62% 5-star reviews and only 13% 1-star reviews</i> . Copies of these reviews on Amazon's website are attached hereto as <b>Exhibit D</b> . The third relates to the Seagate Backup Plus 3TB product, for which Amazon shows <i>51% 5-star reviews and only 23% 1-star reviews</i> . A copy of these reviews on Amazon's website is attached hereto as <b>Exhibit E</b> . As explained in row 16, these rates of 1-star reviews are similar to those for hard drives from other companies. Plaintiffs provide no evidence that any of this information is capable of demonstrating an unreasonably high failure rate.
8	FED_SEAG0093489	Seagate spreadsheet detailing direct customer complaints	This document covers numerous products and sizes of drives not at issue (including wireless products and even products from other manufacturers). Plaintiffs cite one customer message about an "Expansion Desk" but there is no evidence this customer's comment related to the 3TB ST3000DM001 Drive. The Expansion Desk came in at least four sizes (from 1TB to 4TB) (ECF No. 152-3, Ex. 22 at FED_SEAG0070325) and only the 3TB version is at issue in this litigation. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
9	FED_SEAG0093490	Spreadsheet detailing 102,135 customer complaints to Seagate – all complaints are for drives at issue	Plaintiffs' claims about this document are false. This document is an Excel spreadsheet with 102,135 <i>rows</i> . The rows relate to <i>58 different products</i> , only 6 of which are at issue and <i>52 of which are not</i> because they did not contain the ST3000DM001 Drives. The six at-issue products have model numbers STBM3000100, STBN6000100, STBP12000100, STBV3000100, STBV3000200, STCP3000100. These are the 1, 2, or 4 Bay "NAS" products and Seagate Expansion Desk and Seagate Expansion Desk Plus products. The rows that relate to at-issue products can easily be determined by consulting the fourth column of the table, which lists the model numbers of the products.

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			<p><i>See Exhibit F</i> hereto, which contains a printout of the first 41 rows of document FED_SEAG0093490, and the first 12 columns. Columns 1-8 appear on the first page of the printout and columns 9-12 on the second page of the printout. In the fourth column on page 1, I highlighted the model numbers for products at issue. Only eight rows out of the first 41 relate to products at issue (even though Plaintiffs falsely claim all the entries in this table relate to at-issue products). Second, the document relates to customer contacts from anywhere in the world. Approximately 20,000 entries are labeled as being from the “Americas” (North and South), 8,000 are labeled as from the Asia-Pacific region, 20,000 are from Europe, the Middle East or Africa, and the remainder do not have a geographic origin indicator. Third, it is clear that many of the customer <i>contacts</i> reported in this spreadsheet <i>cannot relate to drive failures</i>, since they include requests to help setup software, problems with the operating system (“OS”) or networking, requests for the warranty end date, problems with accessories, etc. Indeed, 1,412 rows in this table relate to <i>thank you emails to Seagate</i>—which Plaintiffs claim to the Court are “complaints.” (<i>See Ex. F</i>, p. 2.) Even contacts mentioning “hardware” in the first column on page two can be about “installation,” “setup,” “network settings” or the drive being full. (<i>See, e.g., Ex. F</i>, p. 2, rows 1, 5, 12, 14, 15.) Similarly, contacts about “Warranty” can simply request the warranty end date.</p> <p>I analyzed the data as follows. I assumed that all entries that mention hardware, RMAs (returns), warranty, failure, or lost data in the first column (issue filter) might relate to “failures” and included them in the analysis even though many of these entries do not relate to failures. I filtered the data to include only products at issue, and to remove duplicate entries for the same issue and drive serial number. I then tallied the non-duplicative contacts relating to hardware, warranties, RMA, failures or lost data for products at</p>

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			issue. There were 12,788 such entries. As noted, these relate to the 1, 2, or 4 Bay “NAS” products and the Seagate Expansion Desk and Seagate Expansion Desk Plus products. Seagate sold 560,994 of these products <i>in the US alone</i> . (Seagate's Verified Supplemental Responses to Plaintiff Nolan's First Set of Interrogatories, Table 1.) Even assuming all 12,788 of the contacts were from the US (they were not), that gives a rate of <b>2.27%</b> contacts that <i>might</i> relate to drive failures. If the 12,788 contacts were narrowed to include only contacts from the US so as to properly compare US contacts to US sales, the rate of contacts would be even lower. Similarly, as described above, the rate includes many contacts that are not related to drive failures, and so is an overestimate for this reason as well.
10	FED_SEAG0076525	Internal Seagate Spreadsheet tracking customer complaints directly to Seagate Customer Service	The cited spreadsheet covers numerous products and sizes of drives, but does have any columns specifying the model numbers or drive sizes. Generally it is not possible to tell whether any given entry relates to a product at issue in this action. Of the four “complaints” Plaintiffs quote, one clearly states that it relates to “SV35” hard drives not at issue, two provide no indication of the drive size and so there is no evidence they relate to the ST3000DM001, and one might relate to the ST3000DM001. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
11	FED_SEAG0094986	Spreadsheet of Business Bay 4 NAS reviews	This document relates to many products, most not at issue. The “Sample Review” Plaintiffs quote is <i>not related</i> to a product at issue. The document specifies that the quoted review relates to the STBP100. The document also links to the product's page on Amazon. I followed the link to the product and found the specific review at issue. Images of these pages are attached hereto as <b>Exhibit G</b> . The product is a diskless box (that does not contain any hard drives, much less the ST3000DM001 Drive). Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.

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12	FED_SEAG0086798	Internal chart on corporate escalations of customer complaints	This document addresses multiple products and does not specify any sizes for any products. There is no evidence that any entries in the document relate to the ST3000DM001 Drive and there is no evidence that the quoted comment relates to the Drive. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
13	FED_SEAG0093307	Email between Seagate employees discussing the difficulty keeping up with warranty claims for 3TB drives	Plaintiffs misrepresent this document. It is from Seagate's recovery service, which recovers data from drives. A complete copy of this document is attached hereto as <b>Exhibit H</b> (FED_SEAG0093307). As Plaintiffs have argued, the recovery service <i>was not part of Seagate's warranty process</i> , but was a separate service for which Seagate charged. ECF No. 62 (Complaint), ¶ 126; <i>see also</i> <a href="https://www.seagate.com/services-software/recover/">https://www.seagate.com/services-software/recover/</a> . This email chain reports that (for unknown reasons) the Recovery Service was “struggling to keep up with the <i>warranty aspects of our data recovery service</i> .” It is unclear what this comment means, but since Seagate Recovery Service was separate from Seagate's normal warranty process, it is irrelevant. <i>Id.</i> Furthermore, the document states that it is seeking to implement a process for 500 GB and 1, 2, 3, and 4 TB drives. It is not specific to 3TB drives. Finally, the email is [REDACTED] (Ex. H, last page), and so it is unclear whether this document even relates to Seagate's US data recovery or warranty operations.
14	FED_SEAG0090931	Internal chart on direct complaints from customers	This document contains entries relating to numerous products not at issue. Plaintiffs quote two “Sample Complaints.” There is no evidence that the first relates to a product at issue in this action. Furthermore, Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
15	FED_SEAG0090915	Internal chart on direct complaints from customers	Column Z of this Excel table clearly lists the model number of the product at issue in each row. The chart contains data on 419 different products (419 different model numbers), only 22 of which are at issue in this Action. I



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			extracted the rows for the products at issue in this Action. There were only 112 rows relating to the products at issue. Furthermore, the focus of the chart is the results of asking customers to rate Seagate's customer support. Thus, many of the alleged “complaints” aren't complaints about drives at all but instead are comments about customer service, such as “Very patient and worked with me until problem was solved;” “He spent a great deal of his time to troubleshoot and resolve my issue with reinstalling software on my recently upgraded OS;” and the like. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
16	FED_SEAG0094984	Internal Seagate document comparing 1 star reviews for negative reviews products; ST3000DM001 has most	This document relates to reviews. Plaintiffs claim the ST3000DM001 had “the most” 1-star reviews, but do not discuss whether the ST3000DM001 also had the most reviews overall, nor <i>what percent</i> of reviews were 1-star. The document contains links to the products reviewed on the Amazon website. The ST3000DM001 product reviewed is the 3TB Desktop HDD (one of the Internal products). As shown in <b>Exhibit I</b> , this product had 61% 5-star reviews and only 17% 1-star reviews—3.6 times more 5-star than 1-star reviews. Furthermore, this <i>percentage</i> of 1-star reviews does not appear unusual for hard drives. Attached hereto as <b>Exhibit J</b> are snapshots of the review distributions for a number of hard drives from various companies. These products from Iomega, Toshiba, Western Digital and HGST have 15% to 21% 1-star reviews (and 54% to 65% 5-star reviews)—no different from the products containing the ST3000DM001 Drives. Plaintiffs also present a chart of “top issues” without explaining that the chart covers <i>42 different models--only one of which is the ST3000DM001 drive</i> . Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.

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17	FED_SEAG0090938	Seagate spreadsheet detailing direct customer complaints	This document contains entries relating to numerous products not at issue; it does not contain any rows relating to model numbers or sizes of drive, so one cannot tell whether any particular entries relate to the Drives at issue. Plaintiffs quote one comment about a “3tb” drive that may or may not be an ST3000DM001. ( <i>See, e.g.</i> , row 19 below explaining that Seagate manufactured many 3TB drives not at issue in this case.) Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
18	FED_SEAG0085843	Internal email about customer complaints	The document does not even use the word “complaint” and says that for the first 6 months of 2015, only 1.5% of the calls Seagate's customer support received were about the ST3000DM001. (“Thus, ~1.5% of calls we've received since 1 Jan are about ST3000DM001, and ~1.8% of those calls are about RAID.”) Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
19	FED_SEAG0084417	Seagate Presentation on the “dearth of 1-star reviews”	First, <i>this is not a new document</i> . The document (with one added sentence) was produced several times in Seagate's production 32 on 8/18/2017 (e.g., FED_SEAG0055656). In addition, Plaintiffs deposed Seagate's witnesses Alan Clark about 1-star review monitoring on October 20, 2017. Second, the charts appear to include models not at issue in this action. The “3TB” drives apparently include all “ST” model number 3TB drives. The bar graph labels these “STX3TB.” This chart is from 2015. As of 2014, Seagate was selling <i>at least 12 other hard drives that were “ST” 3TB drives none of which are at issue in this Action</i> . See ECF No. 152-3, Ex. 23, pp. FED_SEAG0070356-59, 362 (listing 3TB STCG3000100, 3TB ST3000VM002, 3TB ST3000VX002, 3TB ST3000VX000, 3TB ST3000NM0033, 3TB ST3000NM00532, 3TB ST3000NM0023, 3TB ST3000NM00432, 3TB ST3000NM00632, 3, 3TB ST3000VN000, 3TB ST3000NC002, 3TB ST3000NC0003). Therefore, it is not possible to conclude that the charts

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			relate solely or even primarily to the Drives at issue. Third, the document shows twice as many 5-star than 1-star Amazon reviews for the 3TB drive (52.6% 5-star reviews vs 23.4% 1-star reviews), and equal numbers of 5-star reviews to 1-star reviews on NewEgg. In addition, the proportion of 1-star reviews clearly varied substantially over time and across different products. <i>See</i> rows 7, 16 above and <b>Exhibits. D, E, I, J</b> , hereto. Fourth, the discussion Plaintiff quotes goes on to explain that the failures appear to be due to abnormal use of the drives, “The POH [power on hours] was incredibly high so clearly these drives were in very heavy usage environment, clearly outside the normal Desktop workload.” Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
20	FED_SEAG0095597	Internal Seagate spreadsheet recording 496 customer interactions on Newegg between 1/1/16 and 3/23/16	This document records “chat” conversation between shoppers on the NewEgg website and Seagate support. It covers numerous products not at issue. There is no indication any of the shoppers purchased the Drives or experienced any failures.
21	FED_SEAG0095597	Internal Seagate spreadsheet recording 496 customer interactions on Newegg between 1/1/16 and 3/23/16	This is the same document as in row 20 of Plaintiffs' table. As explained above, this document records “chat” conversations between shoppers on NewEgg.com and Seagate support. It covers numerous products not at issue. There is no indication that any of the shoppers purchased the Drives or experienced any failures.
22	FED_SEAG0076421	Internal Seagate document tracking negative reviews Amazon, Best Buy, and Google Play	The document contains purported customer reviews posted on third -party websites. The reviews relate to innumerable products not at issue (everything from a “media app” to personal cloud products and Xbox drives). Plaintiffs' Table in Plaintiffs' Ex. 72 quotes two “sample complaints.” <i>Neither relates to</i>

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			<p><i>the ST3000DM001</i>. Both relate to 5TB drives not at issue.</p> <p>The document contains links to the third party websites containing the customer reviews. I searched and found the two “sample complaints” Plaintiffs quote. I followed the links to the actual websites containing these reviews. Attached hereto as <b>Exhibit K</b> are copies of the actual reviews printed from Amazon.com showing they relate to a 5TB product not at issue. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.</p>
23	FED_SEAG0084392 [sic] actual document is FED_SEAG0084329	Internal discussion at Seagate regarding information on website about drives	<p><b><i>This document is not new.</i></b> The email Plaintiffs cite was produced as part of four different documents in Seagate's third production in <b><i>September, 2016</i></b> (FED_SEAG0000707, FED_SEAG0000775, FED_SEAG0000781, FED_SEAG0024658). The email chain relates to the layout of Seagate's website, and how to better present information. A complete copy of this document is attached hereto as <b>Exhibit L</b> (FED_SEAG0084329). It has no relevance.</p>
24	FED_SEAG0093285	Seagate document recording customer service chats with potential customers	<p>Plaintiffs admit this document relates to “<b><i>potential</i></b>” customers. The “chat” they reproduce is multiple hearsay, apparently not based on the potential customer's personal knowledge, and is not evidence of any failures or failure rate.</p>
25	FED_SEAG0090943	Seagate spreadsheet detailing direct customer complaints	<p>This document contains entries relating to numerous products not at issue; it does not contain any rows relating to model numbers or sizes, so one cannot tell whether any particular entries relate to the Drives. Plaintiffs quote one comment. There is no evidence this comment relates to the ST3000DM001. Furthermore, the comment indicates that Seagate did not consistently publish AFRs for drives, and could not have made an affirmative misrepresentation to this customer. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.</p>

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26	FED_SEAG0090903	Seagate spreadsheet detailing direct customer complaints	The document covers numerous products not at issue. Without reviewing every entry, it is not possible to tell whether any of them relate to the Drive. Plaintiffs quote one comment. There is no evidence that the quoted comment relates to the Drive. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
27	FED_SEAG0090915	Seagate spreadsheet detailing direct customer complaints	This is the same document (FED_SEAG0090915) as in row 15. (See row 15 above.) It contains information on 419 different products, only 22 of which are at issue. Plaintiffs quote three "Sample Complaints" -- two of which (the first and third) <i>do not relate to the ST3000DM001</i> . Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
28	FED_SEAG0090966	Seagate spreadsheet summarizing all Amazon reviews for 2TB, 3TB and 4TB drives	<i>This document is not new.</i> Seagate produced the same document-- <i>including the bar graph Plaintiffs reproduce in their Exhibit 72</i> --in its production 25 on 6/16/2017 (FED_SEAG0053031). Furthermore, the document and graph are from 2015 and apparently covers all 3TB "ST" drives--labeled as "STX" drives in the spreadsheet. As discussed in row 19, by 2014, Seagate was selling at least <i>12 other 3TB hard drives</i> with "ST" model numbers. There is no way to determine how many of the <i>reviews</i> referenced relate to the Drives at issue. Furthermore, the percentage of 1-star reviews apparently fluctuated significantly over time and between different products and different websites. It may be listed as "56%" in this chart, but it is 13% and 23.4%, at other times and in other contexts. <i>See</i> rows 7 and 19. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.
<b><i>The Rows below contain Seagate's response to Plaintiffs' Exhibits 73 – 77</i></b>			
Plaintiffs' Exhibit 73	FED_SEAG0072969 [sic]	Plaintiffs' claim: "in Seagate's newly produced marketing	Plaintiffs misrepresent and misquote the document. The document compares and contrasts "emerging markets" vs. "developed markets." It explains, [REDACTED]

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	Plaintiffs' Exhibit 73 is actually FED_SEAG0072901	team meeting notes, Seagate concedes [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] ECF 175-4 at 3:10-12.	[REDACTED] [REDACTED]." Plaintiffs misquote the statement at issue which says, in full, "[REDACTED] The document goes on to explain [REDACTED] [REDACTED] Thus, the document does not support Plaintiffs' claim at all.
Plaintiffs' Exhibit 74	FED_SEAG0090966	<u>Plaintiffs' claim:</u> "Seagate's meticulous data collection demonstrates an extraordinary number of customer complaints (e.g., 1-star ratings) for <b>all</b> the 3TB ST3000DM001 drives (the red line in the following graph)" ECF 175-4 at 3:13-15.  Plaintiffs reproduce a graph from this document on p. 4 of their proposed Second	This is the same document referenced in row 28 of Plaintiffs' Exhibit 72. As explained in row 28 above, first, <b>this document is not new</b> . Seagate produced the same document on 6/16/2017—including the bar graph <b>Plaintiffs reproduce in their proposed Second Supplemental Brief (ECF No. 175-4 at 4)</b> . (Seagate previously produced this same document in its production 25 as FED_SEAG0053031). Furthermore, the document and graph are from 2015 and apparently cover all 3TB "ST" drives—labeled as "STX" drives in the document and in Plaintiffs' excerpt ("STX Last 6 months"). As discussed in row 19 above, by 2014, Seagate was selling at least <b>12 other 3TB hard drives</b> with "ST" model numbers. There is no way to determine how many of the <b>reviews</b> referenced in the chart or the document relate to the Drives at issue. Furthermore, the percentage of 1-star reviews apparently fluctuated significantly over time and between different products and different websites. It may be listed as "56%" in this chart, but it is 13% and 23.4%, at other times and in other contexts. See rows 7 and 19 above. Plaintiffs provide no evidence that this document or the graph they reproduce, could be used to determine a failure rate for the Drives.

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		Supplemental Brief. ECF 175-4 at 4.	
Plaintiffs' Exhibit 75	FED_SEAG0094984	<p><u>Plaintiffs' claim:</u> "[d]ocuments examining Amazon reviews show astounding spikes in complaints for reliability/failure of ST3000DM001 drives." ECF 175-4 at 4:18-5:16.</p> <p>Plaintiffs also reproduce a chart of "Top 1 Star Issues" on page 5 of their proposed Second Supplemental Brief. ECF 175-4 at 5.</p>	<p>Plaintiffs' Exhibit 75 is a chart extracted from document FED_SEAG0094984. Plaintiffs cite the same document and chart in row 16 of their Exhibit 72. As explained in row 16 above, the chart covers <i>42 different models--only one of which is the ST3000DM001 drive</i>. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives.</p> <p>In addition, as explained above, the document refers to 1-star reviews for the 3TB Desktop HDD (Internal product). That product had 61% 5-star reviews and only 17% 1-star reviews--3.6 times more 5-star than 1-star reviews. (<i>See Exhibit I hereto.</i>) This percentage of 1-star reviews is well within the range for hard drives from other manufacturers. (<i>See row 16 and Exhibit J hereto.</i>)</p>
Plaintiffs' Exhibit 76	FED_SEAG0094643	<p><u>Plaintiffs' claim:</u> "Seagate employee, while analyzing Amazon 1-star reviews, states '[redacted]'</p> <p>[redacted]</p> <p>[redacted]</p> <p>[redacted]</p>	<p>First, <i>this document is not new</i>. Seagate produced the email chain to which Plaintiffs cite on at least two prior occasions, its productions 7 and 21 on 10/21/2016 and 6/2/2017 respectively. (FED_SEAG0007293 and FED_SEAG0032683).</p> <p>Second, the email chain shows that the analysis covered several sizes of drives. The Seagate employee explains, [redacted]</p> <p>[redacted]</p>



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<u>Row in Plaintiffs' Ex. 72 or Exhibit</u>	Document Cited by Plaintiffs	Plaintiffs' Description	Seagate's Response
		[REDACTED] ECF 175-4 at 5:14-17.	[REDACTED].” There is no evidence that the comments reflect primarily or only the drives at issue in this litigation.  Finally, there is nothing to indicate what the failure <i>rate</i> might have been. Plaintiffs provide no evidence that this document could be used to determine a failure rate for the Drives at issue.
Plaintiffs' Exhibit 77	FED_SEAG0086631-37	<u>Plaintiffs' claim:</u> that in 2015, “a senior technical writer appears to have pulled AFR statements, reliability statements, and statements regarding case temperature from other product manuals and added them to the Desktop HDD manual” AFR. ECF 175-4 at 6:4-12.	This document merely shows Karl Schweiss, senior technical writer at Seagate, revising template reliability information pulled from another product manual to suit the Desktop HDD product. Mr. Schweiss asks the other Seagate employee on the email chain, Keith Myers, to review red text to ensure it is accurate for the Grenada BP (Desktop HDD). As the conversation continues, Schweiss edits the AFR and POH specifications to fit the Desktop HDD product.